



AMERICAN ASSOCIATION
OF EDUCATIONAL
SERVICE AGENCIES

DOCKET FILE COPY ORIGINAL

December 18, 1996

DEC 19 1996

FCC MAIL ROOM

Federal Communication Commission
Attn. Federal State Joint Board on Universal Service
1919 M St. NW
Washington, DC 20554

Docket No. 96-45

Dear Members of the Federal State Joint Board on Universal Service:

The American Association of Education Service Agencies (AAESA) is the professional organization for education service agency leaders, board members and staff. While AAESA has been monitoring the Telecommunications Law through the actions of EDLINC, our association thought it would be best to respond directly to the Joint Board on the topic of consortia as addressed in the proposed rules and regulations, since by our very nature, we will be the educator's choice for consortium needs.

First, we wish to thank you for strongly supporting education, especially endorsing the use of technology in the classroom to expand students' minds and broaden their horizons. Using technology for educational purposes is critical for our school districts. Schools need to utilize all sources of connectivity available today and those not yet envisioned.

AAESA would like to bring up six points for consideration when you review the proposal. We have addressed nothing out of the ordinary, just points to consider as submitted by the education consortium entities recognized by federal, state and local law.

When reviewing the draft proposal, please continue to remain as technology neutral as possible. Local schools and libraries need maximum flexibility to determine the best technologies to meet their own unique needs. While some fiber proponents have strongly discouraged wireless technology, wireless often is the best choice (particularly in the West) because of terrain, cost, convenience, efficiency and weather. To account for regional differences, local entities need the freedom to choose technologies as they see fit.

When the Board considers what constitutes a "disadvantaged" area and a "high cost" area, the definition decided on must consider uniquely rural issues, including toll costs associated with rural and remote schools and libraries. Distance to urban centers and lack of population density are major issues that must be included when considering what constitutes a "high cost" area as well.

No. of Copies rec'd
List ABCDE

023

Schools must not be limited to school lunch statistics (real or potential) in determining economic disadvantage. Schools need the flexibility to consider other reasonable factors, including census data. As we understand it, AAESA supports EDLINC proposal's for an alternative formula when figuring the discount.

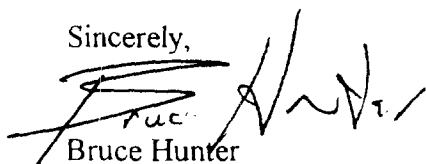
With regard to eligibility, the Act currently states that schools must meet the statutory definitions found in the "Elementary and Secondary Education Act of 1965." This definition should be clarified to state, the "Elementary and Secondary Education Act of 1965, as amended by the Improving America's Schools Act of 1994, IASA." Education service agencies (ESA's) are defined in the IASA, thus eligible for the same federal grants and funding streams as school districts. ESA's are funded through state or local funding streams with small supplementary grants from the federal government. This arrangement is determined within each state and should be kept so, but ESA's need to be included in the definition for federal tracking purposes.

With regard to consortia, the definition must explicitly state the eligibility of ESA's because they often serve as the regional hubs for large numbers of public and private schools. To exclude ESA's would be tantamount to excluding most rural schools. Education service agencies must also be able to figure their discount formulas in the same manner their member schools do, because ESA's use technology for educational purposes, such as distance learning; direct instruction in low incidence areas, such as special education, vocational education; and advance placement or honors courses.

We also request that consortia members be able to determine who is involved in the consortium and take on the task of segregating the bookkeeping. In Washington state, educational service districts provide the backbone for the state's evolving technology education networks, which include community colleges, vocational institutions and state universities, along with elementary and secondary schools. This is a local and state decision. We recognized the added paperwork requirement, but we are willing to fill out the forms to continue our consortia relationships.

Again, thank you for your stance on education and the use of technology in the classroom and school buildings. We recognize that there may be some unforeseeable trouble spots that we will need to deal with when we encounter them, but this proposal is a great step in the right direction and we look forward to working with the Board and the state commissioners to see this implemented, hopefully by school year 1997-98.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Hunter", is written over a horizontal line.

Bruce Hunter
Executive Director